

8-12-83

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, hereby swear under the pains and penalties of perjury that the following facts are true based upon my own personal knowledge and observation:

1) I was a member of the Sea Organization of Scientology from February 1971 to December 1981, during which time I held many positions and was in many locations where I directly observed L. Ron Hubbard and other Scientology executives. During this period of time, I personally met with, spoke to, and had numerous dealings with L. Ron Hubbard, Laurel Sullivan, David Miscavige, James Isaacson, Ann Broeker, Pat Broeker, and Lyman Spurlock. Each of the above-named individuals have held various positions as executives and agents and employees within the Church of Scientology of California while at the same time, being directly answerable to L. Ron Hubbard. Hubbard totally controlled the Church of Scientology, based upon my own observations, from at least February 1971 until the time that L. Ron Hubbard left in March 1980 from Hemet, California.

2) After Mr. Hubbard left Hemet, California, David Miscavige became the head of the Church of Scientology and Lyman Spurlock became its highest financial official.

James Isaacson, ostensibly Mr. Hubbard's personal accounts officer, received his orders from David Miscavige and was in regular communication with other Church of Scientology executives concerning the financial management of the organization. These individuals were in regular contact with Attorney Sherman Lenske and other Hubbard attorneys. Laurel Sullivan was one of the highest Church officials, specifically in charge of a project called the "MCCS" Mission, which related to the control by L. Ron Hubbard of all aspects of the Church of Scientology. David Miscavige informed other high Scientology executives throughout the period from March 1980 to when I left in December, 1981, that he was in regular communication with Mr. Hubbard and with Pat and Ann Broeker.

3) In March 1980, when Mr. Hubbard left Hemet, California, two high-level Scientology staff members, Pat Broeker and Ann Broeker, also left with him. After Mr. Hubbard's departure, David Miscavige assumed complete control of all Scientology organizations, based upon the alleged authority that he was the only person in direct communication with L. Ron Hubbard. It has been the policy and practice of those persons in senior positions in the Church of Scientology, such as David Miscavige and others to lie about Mr. Hubbard's involvement with Scientology, his

control of operations and finances, his whereabouts, his health, his mental and emotional competency and stability, and other such issues. For example, in 1976, in order to hide the fact from other Scientologists and from the public that Mr. Hubbard had left the area of Clearwater, Florida, he had one of his personal staff from Clearwater sign his name to dispatches sent to him from Scientology staff members. This staff member, Joyce Popham, was so proficient at forging his signature and handwriting that she wrote messages like "very well done," "thank you very much" and similar things in Mr. Hubbard's handwriting back to organization staff who knew his writing. The forgeries were never discovered. The practice of having one of this staff sign his signature was on Mr. Hubbard's order and was very common. Staff members whom I knew personally to have signed Mr. Hubbard's name to letters, contracts or legal documents or inscriptions in books were: Aletheia Taylor, Janice Kennedy, Laurie Jensen, Joyce Popham, and Laurel Sullivan.

4) I also knew it was the policy and practice of Mr. Hubbard and those in senior positions in Scientology to actually lie about Hubbard's whereabouts and activities. I was personally involved in a massive operation to locate and destroy all evidence concerning Hubbard's connection to the

Church of Scientology, control over its organizations including the Guardian's Office, and finances, his location and other such documents. In Gilman Hotsprings, California, in January 1980, I was required to destroy all the memos I had received from Hubbard ordering work to be done on his house and his properties. I was also ordered to destroy any other evidence of Mr. Hubbard's mental and emotional illnesses, his fraudulent and misrepresented background, and the various tortious and criminal activities of the Church of Scientology. However, many of these documents I did not destroy but maintained possession of as part of the project Hubbard assigned me to in connection with the preparation of his biography. These documents are currently on file in the Los Angeles Superior Court in the case of Church of Scientology v. Armstrong. In that case, I was sued by the Church of Scientology of California and have counter-sued L. Ron Hubbard in connection with the right to possess these documents. However, Mr. Hubbard has failed to appear and claim said documents, notwithstanding the fact that his wife, Mary Sue Hubbard has intervened in this action and has claimed that the documents belong to her, that her husband has a right of privacy in the documents, and that the documents are worth millions of dollars. The Los Angeles Superior Court has recently denied Mary Sue Hubbard claim to

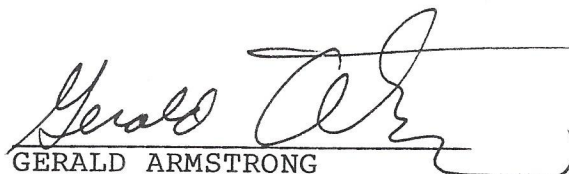
obtain possession of the documents and the documents are currently under seal in said court.

5) I am informed that Hubbard's attorneys have asserted in the case of Burden v. Church of Scientology, Tampa Federal District Court, No. 80-501-Civ-T-K, that no person has communicated with Hubbard from the Church of Scientology of California since February, 1980. This is a total falsehood. Miscavige, Spurlock and Isaacson are all members of the "Sea Org" which was owned by the Church of Scientology of California (CSC) until at least early 1982. They all received "Sea Org Pay" from CSC and they all handled Hubbard's affairs for him personally and for CSC. Other CSC personnel who communicated to Hubbard during 1980 and 1981, who knew how to get correspondence to him, who knew that Hubbard had absolute control of all of Scientology, and who knew that, under Hubbard and the Broekers, David Miscavige was the head of Scientology, were David Mayo, Diana Reisdorf, Gale Irwin, John Nelson, Mark Yaeger, and Lois Reisdorf among others.

6) In 1980, I learned from Laurel Sullivan that Philip Park, known to me to be the CSC Legal Officer in Clearwater, Florida, had been required by the Court to make a search among Church executives for anyone who knew of Mr.

Hubbard's location, or way of getting correspondence to him. Ms. Sullivan also informed me that Mr. Park had been careful not to ask anyone who would know of the procedure for communicating to Mr. Hubbard. Mr. Park's "search" was a joke among many of us, including myself, Laurel Sullivan and Dick Sullivan, who knew that the search was done so as to deceive the Court. Later, in 1981, I talked with Philip Park and joked with him about his "search," since both of us knew it was a fraud. It was known to all Scientology executives that a secret group called Watch Dog Committee (WDC) managed all the Scientology organizations for Mr. Hubbard, and were in communication with him through David Miscavige. David Mayo, Diana Residorf, Gale Irwin, John Nelson, Mark Yaeger, Lois Reisdorf, and David Miscavige were all WDC members. Lying under oath and deceiving Courts are common practice in Scientology and are expected of Scientology staff members.

Executed under the pains and penalties of perjury on this 12th day of August, 1983 at Costa Mesa, California under the laws of the State of California.


GERALD ARMSTRONG